

JUL 31 2019

July 30, 2019

Mr. Mark Gorog
Air Quality Program
PADEP – Bureau of Air Quality Control
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222

~~PA-000780446~~
(BATCH) 220

U.S. EPA Region III, Air Protection Division
Office of Air Enforcement & Comp. Assistance – NSPS
1650 Arch Street (3AP00)
Philadelphia, PA 19103

RE: ETC Northeast Field Services, LLC
Pike Compressor Facility (Permit No. 04-00741A)
OOOOa Semiannual LDAR Report

To Whom it May Concern:

The Pike Compressor Facility located in New Sewickley Township, Beaver County (Pike Compressor Facility) is currently authorized to operate via Plan Approval PA-04-00741A. In accordance with NSPS Subpart OOOOa, attached is the Semiannual LDAR report.

If you have any further questions regarding this matter, please do not hesitate to contact me at 313-706-9455 or via email at lauren.sion@energytransfer.com.

Respectfully,



Lauren Sion
Environmental Specialist

Attachment



Fugitive Emission Report

ETC Northeast Field Services, LLC.

Pike

Semi-Annual Report

NSPS Subpart OOOOa

PERIOD: 2019-Jan-01 to 2019-Jun-30

Prepared By:

Target Emission Services

800 Town and Country Blvd. (Suite 300)
Houston, Texas, 77024

WWW.TARGETEMISSION.COM

Report Generated on: 7/29/2019

INTRODUCTION



Company:	Energy Transfer	Report:	Semi-Annual LDAR
District:	Pennsylvania	Regulation(s):	NSPS Subpart OOOOa
Facility Name:	Pike	Report Date:	2019-Jul-29
Facility Address:	282 Teets Road, Rochester, PA 15074	Start Date:	2019-Jan-01
GPS Coordinates	40.745859°	End Date:	2019-Jun-30

Target Emission Services (TARGET) conducted the leak detection and repair (LDAR) monitoring at the Energy Transfer Pike facility for the period of January to July, 2019. The LDAR program at this facility was initiated in May 2018. This monitoring was completed to meet the requirements of the New Source Performance Standards (NSPS) Subpart OOOOa which applies to on-shore natural gas processing plants.

This report presents the details of the LDAR monitoring inspections performed at the Pike facility, located in Pennsylvania. The data is presented per process unit and contains all information specified by 40 CFR 60.5422 of Subpart OOOO. This facility has two (2) process units applicable to the leak detection requirements:

1. Compression
2. Process Area

There were no plan shut downs from January to June, 2019. Currently, there is a planned shutdown scheduled between August 20th and August 23th, 2019.

The LDAR monitoring was performed in accordance with EPA Method 21 as well as the Alternative Work Practice codified at 40 CFR 60.18. Please see APPENDIX A – Methodology for more details.

Component			# of Leaks
Name	Code	Count	
Valve	VLV	2,995	11
Connector	CONN	18,068	33
Pressure Relief Device	PRD	89	1
Pump	PMP	12	0
Compressor	COMP	12	0
TOTAL		21,176	45

MONITORING SUMMARY



Company:	Energy Transfer	Regulation(s):	NSPS Subpart OOOOa
Facility Name:	Pike	Period:	January to June 2019

Process Unit:	COMPRESSION
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COMPONENT COUNT					
Component Category	Initial Gross Inventory Count	Previously Exempt*	Currently Exempt*	Added(+) or Removed(-) During Period	Final Net Count Subject to the Requirement
VLV	718	0	0	0	718
CONN	9,649	5	5	0	9,649
PRD	43	0	0	0	43
PMP	0	0	0	0	0
COMP	8	0	0	0	8
TOTAL	10,418	5	5	0	10,418

MONITORING RESULTS					
Month	Component	New Leaks	Not Repaired in 15 Days	Repaired DOR Leaks	Current DOR Leaks
JANUARY	VLV	0	0	0	0
	CONN	8	0	0	0
	PRD	0	0	0	0
	PMP	0	0	0	0
	COMP	0	0	0	0
FEBRUARY	VLV	0	0	0	0
	CONN	0	0	0	0
	PRD	0	0	0	0
	PMP	0	0	0	0
	COMP	0	0	0	0
MARCH	VLV	4	0	0	0
	CONN	2	0	0	0
	PRD	0	0	0	0
	PMP	0	0	0	0
	COMP	0	0	0	0
APRIL	VLV	0	0	0	0
	CONN	0	0	0	0
	PRD	0	0	0	0
	PMP	0	0	0	0
	COMP	0	0	0	0
MAY	VLV	4	0	0	0
	CONN	9	0	0	0
	PRD	1	1	0	1
	PMP	0	0	0	0
	COMP	0	0	0	0
JUNE	VLV	0	0	0	0
	CONN	0	0	0	0
	PRD	0	0	0	0
	PMP	0	0	0	0
	COMP	0	0	0	0
TOTAL	VLV	8	0	0	0
	CONN	19	0	0	0
	PRD	1	1	0	1
	PMP	0	0	0	0
	COMP	0	0	0	0
	ALL COMPONENTS	28	1	0	1

*Components are designated as EXEMPT if they meet any exemption criteria of the applicable LDAR regulation (i.e. Stream Below 10% VOC, Inaccessible (buried, insulated, obstructed), Welded or Removed from Service)

MONITORING SUMMARY



Company:	Energy Transfer	Regulation(s):	NSPS Subpart OOOOa
Facility Name:	Pike	Period:	January to June 2019

Process Unit:	PROCESS AREA
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COMPONENT COUNT					
Component Category	Initial Gross Inventory Count	Previously Exempt*	Currently Exempt*	Added(+) or Removed(-) During Period	Final Net Count Subject to the Requirement
VLV	2,193	2	2	+84	2,277
CONN	8,217	0	0	+202	8,419
PRD	45	0	0	+1	46
PMP	12	0	0	0	12
COMP	4	0	0	0	4
TOTAL	10,471	2	2	+287	10,758

MONITORING RESULTS					
Month	Component	New Leaks	Not Repaired in 15 Days	Repaired DOR Leaks	Current DOR Leaks
JANUARY	VLV	0	0	0	0
	CONN	6	0	0	0
	PRD	0	0	0	0
	PMP	0	0	0	0
	COMP	0	0	0	0
FEBRUARY	VLV	0	0	0	0
	CONN	0	0	0	0
	PRD	0	0	0	0
	PMP	0	0	0	0
	COMP	0	0	0	0
MARCH	VLV	2	0	0	0
	CONN	2	0	0	0
	PRD	0	0	0	0
	PMP	0	0	0	0
	COMP	0	0	0	0
APRIL	VLV	0	0	0	0
	CONN	0	0	0	0
	PRD	0	0	0	0
	PMP	0	0	0	0
	COMP	0	0	0	0
MAY	VLV	1	0	0	0
	CONN	6	0	0	0
	PRD	0	0	0	0
	PMP	0	0	0	0
	COMP	0	0	0	0
JUNE	VLV	0	0	0	0
	CONN	0	0	0	0
	PRD	0	0	0	0
	PMP	0	0	0	0
	COMP	0	0	0	0
TOTAL	VLV	3	0	0	0
	CONN	14	0	0	0
	PRD	0	0	0	0
	PMP	0	0	0	0
	COMP	0	0	0	0
	ALL COMPONENTS	17	0	0	0

*Components are designated as EXEMPT if they meet any exemption criteria of the applicable LDAR regulation (i.e. Stream Below 10% VOC, Inaccessible (buried, insulated, obstructed), Welded or Removed from Service)

DELAY OF REPAIR LIST

Company:	Energy Transfer	Report:	Semi-Annual LDAR
District:	Pennsylvania	Regulation(s):	NSPS Subpart OOOOa
Facility Name:	Pike	Report Date:	2019-Jul-02
Facility Address:	232 Teas Road, Richdale, PA 15074	Start Date:	2018-Jul-01
GPS Coordinates:	40.745859° -80.169484°	End Date:	2018-Dec-31

The following list contains all the leaks that have a current status of Delay of Repair (DOR) or were previously classified as DOR but are now repaired.

District	Facility	Emission ID #	Detection Date	Component	Emission Description	LDAR Tag ID	Repair Status	Repair Status Date	First Attempt Due Date	Final Repair Due Date	DOR Start Date	DOR End Date	DOR Reason	DOR Approver Name	Repair Confirmation Method
Pike	PIKE-Compression	26810882	05/31/2019	Pressure Relief Device - OOOO	Seat of PRV on Aftercooler Inlet Line, Reciprocating Compressor Unit 8.	002283.000	Delay of Repair	06/19/2019	06/05/2019	06/15/2019	07/30/2019	07/31/2019	Other	Kodi Ronacher	-
Pike	PIKE-Process Area	26810074	08/01/2018	Valve - OOOO	Seat of Blowdown Valve on Southwest Side of HPI-1 Valve Setting #1.	000190	Delay of Repair	08/14/2018	08/06/2018	08/16/2018	08/14/2018	08/14/2019	Other	Kodi Ronacher	-
Pike	PIKE-Process Area	26810075	08/01/2018	Valve - OOOO	Seat of Blowdown Valve on Northeast Side of B2 Lateral Valve Setting #4.	000182	Delay of Repair	08/14/2018	08/06/2018	08/16/2018	08/14/2018	08/14/2019	Other	Kodi Ronacher	-
Pike	PIKE-Process Area	26810076	08/01/2018	Valve - OOOO	Seat of Ball Valve at Pig Hatch, B4 Lateral Valve Setting #4, North of Slug Catchers.	000156	Delay of Repair	08/14/2018	08/06/2018	08/16/2018	08/14/2018	08/14/2019	Other	Kodi Ronacher	-
Pike	PIKE-Compression	24610108	07/02/2018	Connector - OOOO	Threaded Connection Below Kinray Temperature Switch, Outside Compressor Building on East Line to Coolers, Unit 5.	002017.001	Delay of Repair	07/19/2018	07/07/2018	07/17/2018	07/17/2018	07/01/2019	Shutdown required	Kodi Ronacher	-
Pike	PIKE-Process Area	24310018	05/21/2018	Valve - OOOO	Seat of Ball Valve, Downstream From Actuator on High Pressure Launcher Line, HPI-1 Valve Setting #1, North of Slug Catchers.	T18	Delay of Repair	06/05/2018	05/26/2018	06/05/2018	06/05/2018	06/07/2019	Shutdown required	Russ Klase	-
Pike	PIKE-Compression	11010064	11/01/2018	Connector - OOOO	Bottom Threaded Connection on Reducer Between Flange and Temperature Switch, East Discharge Line, Between Compressor Building and Bottom Sump.	02017.003	Delay of Repair	11/15/2018	11/06/2018	11/16/2018	11/15/2018	11/15/2019	Shutdown required	Kodi Ronacher	-
Pike	PIKE-Process Area	27310082	11/03/2018	Connector - OOOO	Threaded Connection of Gate Valve on Bottom Sump, East Side of Stabilizer Separator, West of Refig Stud.	002761.002	Delay of Repair	11/29/2018	11/08/2018	11/18/2018	11/20/2018	11/20/2019	Shutdown required	Kodi Ronacher	-
Pike	PIKE-Process Area	27310084	11/03/2018	Connector - OOOO	Thread East of Valve, Southeast of Stabilizer Separator, West of Refig	002806.001	Delay of Repair	11/19/2018	11/08/2018	11/18/2018	11/19/2018	11/20/2019	Shutdown required	Kodi Ronacher	-

Alternative Work Practice

The Alternative Work Practice (AWP) to Detect Leaks from Equipment was utilized to conduct this LDAR program. This voluntary AWP allows owners or operators to identify leaking equipment using an optical gas imaging (OGI) instrument instead of a leak monitor prescribed in 40 CFR part 60, Appendix A-7. The use of OGI over conventional Method 21 has shown to provide:

- Significant increase in efficiency and reduction of assessment time
- Able to scan components that were previously unsafe or inaccessible
- Visualization of specific leak source preventing leak and repair errors (eliminates "ghost leaks")
- Video image of leak sources and full video record of inspection for auditing

When the alternative work practice is used to detect leaking equipment, the regulated equipment must also be monitored annually using a 40 CFR part 60, Appendix A-7, Method 21 monitor at the leak definition required in the applicable subpart.

Instrument

Owners or operators are required to use an optical gas imaging instrument capable of imaging compounds in the streams that are regulated by the applicable rule. The imaging instrument must provide the operator with an image of the leak and the leak source. The FLIR GF 320 was utilized to conduct the leak detection program at this facility. The GF 320 meets all applicable requirements of the AWP.

Performance Test

A daily instrument check is performed to confirm that the optical gas imaging instrument is able to detect leaks at the emission rate specified in the AWP. The instrument check consists of using the optical gas imaging instrument to view the mass flow rate required to be met exiting a gas cylinder at a recorded distance. This recorded distance is then used as the maximum allowable distance between the instrument and components during the monitoring.

Record Keeping

The daily instrument check documentation is recorded and saved for each day of use. The instrument identifier, technician name, gas type, flow rate and test distance are recorded. The video image of the daily check is also saved for review. A video record is used to document the leak survey results. The video records include a time and date stamp for each monitoring event.

Frequency

The frequency of monitoring is determined based on Table 1 to Subpart A to Part 60 – Detection Sensitivity Levels (grams per hour). For this facility all detection sensitivity levels were tested at or below 60 grams per hour. Based on this level a bi-monthly monitoring frequency was used. In addition to the bi-monthly OGI monitoring, conventional Method 21 monitoring is conducted on all regulated components annually.

Conventional Method 21

All Method 21 monitoring was conducted in accordance with the operational and maintenance procedures and guidelines as specific in the applicable rules. The instrument used for monitoring is the Bascom Turner Gas Rover, which uses a catalytic combustion sensor with a range of 0-40,000 ppm. This instrument meets all the performance requirements of Method 21. The instruments are calibrated and undergo daily performance tests in accordance with the applicable requirements.